

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

JANET BAKER and JAMES BAKER,
JKBAKER LLC and JMBAKER LLC,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

Civil Action No.: 04-10501 (PBS)

GARY B. FILLER and LAWRENCE
PERLMAN, Trustees of the TRA Rights Trust,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

Civil Action No.: 04-10477 (PBS)

STONINGTON PARTNERS, INC., a Delaware Corporation, STONINGTON CAPITAL APPRECIATION 1994 FUND L.P., a Delaware Partnership and STONINGTON HOLDINGS, L.L.C., a Delaware limited liability company,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM (formerly known as ARTESIA BANKING CORP., SA),

Defendants.

Civil Action No.: 04-10411 (PBS)

**DEFENDANT DEXIA BANK BELGIUM'S UNOPPOSED MOTION FOR LEAVE TO
FILE DECLARATION UNDER SEAL**

Defendant Dexia Bank Belgium ("Dexia") hereby moves this Court pursuant to Local Rule 7.2, for orders authorizing the filing under seal, in each of the above-captioned actions, of the Declaration of Thomas Teige Carroll dated June 16, 2006, together with the exhibits thereto (the "Carroll Declaration").

In support of this unopposed motion, Dexia states as follows:

1. On May 31, 2005, the Court entered an Order Governing the Treatment of Confidential Information in each of the above-captioned actions (the "Confidentiality Order"). A true and correct copy of the Confidentiality Order is annexed hereto as **Exhibit A**. Under the terms of the Confidentiality Order, memoranda of law and declarations containing or disclosing materials that a producing party has designated as "Confidential Information" must be filed with the Court under seal.

2. On June 16, 2006, Dexia filed and served a Motion to Compel a Complete Response to Its Second Set of Interrogatories to the Baker, Filler and Stonington Plaintiffs.

3. Dexia also filed the Carroll Declaration in support of that motion. The Carroll Declaration should not have been publicly filed because the exhibits thereto contain documents designated confidential by Plaintiffs under the terms of the Confidentiality Order.

4. Upon noticing this error, the parties arranged to have the Carroll Declaration removed from the public docket temporarily.

5. Dexia now seeks an order allowing the Carroll Declaration to be filed under seal.

WHEREFORE, Dexia respectfully requests that this Court enter an order authorizing the filing under seal, in each of the above-captioned actions, of the Declaration of Thomas Teige Carroll dated June 16, 2006, together with the exhibits thereto.

Dated: June 21, 2006

Respectfully submitted,

MINTZ LEVIN COHN FERRIS
GLOVSKY & POPEO

By: /s/ Breton Leone-Quick
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Counsel for Dexia Bank Belgium

CERTIFICATION

Pursuant to Local Rule 7.1(A)(2), counsel for Dexia hereby certifies that counsel for Plaintiffs do not oppose the instant motion seeking to file papers in support of the Motion to Compel under seal.

CERTIFICATE OF SERVICE

I, Breton Leone-Quick, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on June 21, 2006.

/s/ Breton Leone-Quick

Dated: June 21, 2006